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5 Hon. Richard Jones
6 Hon. James P. Donohue
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KYLE LYDELL CANTY,

Plaintiff,

NO. 2:16-CV-01655-RAJ-JPD

vs.
CITY OF SEATTLE, et al.,

Defendants.

DECLARATION OF
AMEE J. TILGER

NOTE ON MOTION CALENDAR:
December 1, 2017

I, AMEE J. TILGER, declare as follows:

1. I am over the age eighteen (18), am competent to testify, and make this declaration based on my personal knowledge.

2. I am one of the attorneys of record for City of Seattle, Officer Marshall Coolidge, Sean Culbertson, Timothy Renihan and Officer Hancock (hereinafter collectively “the City”) in the above-captioned lawsuit brought by Plaintiff Pro Se Kyle Canty. As such, I am familiar with the contents of the case file.

3. On October 30, 2017, I received an electronic notification from the statewide Victim Information and Notification Service (VINE) that Mr. Canty was released from the

1 Washington Corrections Center (WCC) on October 30, 2017. Attached to this declaration as
2 **Exhibit A** is a true and accurate copy of the email notification I received.

3 4. On October 30, 2017, I contacted WCC staff to find a forwarding address for
4 Mr. Canty and was advised that the Department of Corrections had no forwarding address for
5 him. Attached to this declaration as **Exhibit B** is a true and accurate copy of my email
6 exchange with WCC staff.

7 8. 5. On October 31, 2017, our office sent letters by certified mail to Mr. Canty at his
9 last known addresses. A true and accurate copy of the letter is attached to this declaration as
10 **Exhibit C**. As the letter reflects, Mr. Canty was asked to provide counsel and the court with
11 his current address. Included with the letters were copies of the Court's Order Striking
12 Plaintiff's Submissions and Re-Noting Dispositive Motions [Dkt. 149]; City of Seattle's
13 Interrogatories and Requests for Production to Plaintiff; and authorizations and stipulations for
14 Plaintiff's medical records. Mr. Canty was also asked to respond to the discovery requests, and
15 sign and return the authorizations and stipulations.

16 17. 6. These certified letters were delivered and signed for by individuals on Mr.
18 Canty's behalf. Attached to this declaration as **Exhibit D** are true and accurate copies of the
19 certified mail receipts returned to our office.

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7. As of this date, Mr. Canty has not contacted our office, returned responses to the City's discovery requests or executed authorizations and stipulations, or filed a response to the City's motion to dismiss.

I declare under penalty of perjury under the laws of the State of Washington that the forgoing is true and correct.

DATED this 29th day of November, 2017, at Seattle, Washington.

Amee Tilger #37613
AMEE J. TILGER

CERTIFICATE OF SERVICE

I certify that on the 1st day of December, 2017, I electronically filed the foregoing documents with the Clerk of the Court using CM/ECF E-Filing Systems, and notifying of such filing to the following:

Pro se Plaintiff, Kyle Lydell Canty 1700 7 th Avenue Suite 116, Unit 365 Seattle, WA 98101	(X) U.S. Mail
Samantha D. Kanner, WSBA #36943 Deputy Prosecuting Attorney King County Prosecuting Attorney's Office 500 Fourth Avenue, 9 th Floor Seattle, WA 98104 (206) 296-8820 <u>SamanthaKanner@kingcounty.gov</u> Attorney for King County	(X) ECF Electronic Filing

I certify under the penalty of perjury under the laws of the United States and the State of Washington that the foregoing is true and correct.

DATED this 1st day of December, 2017, in Seattle, Washington.

s/Courtney Grubb
COURTNEY GRUBB, Legal Assistant
courtneyg@ftl-law.com